

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ARISE FOR SOCIAL JUSTICE; *et OISTE?*; NEW ENGLAND STATE-AREA CONFERENCE OF THE NAACP; REV. TALBERT W. SWAN, II; GUMERSINDO GOMEZ; FRANK BUNTIN; RAFAEL RODRIQUEZ; and DIANA NURSE,

Plaintiffs,

v.

CITY OF SPRINGFIELD and SPRINGFIELD ELECTION COMMISSION,

Defendants.

Civil Action No. 05-30080 MAP

AFFIDAVIT OF ANNA-MARIE TABOR

1. I am an Associate at Goodwin Procter, LLP (“Goodwin”). I have personal knowledge of the facts set forth in this affidavit.

2. I helped prepare several of Plaintiffs’ Trial Affidavits, including the Trial Affidavit of Cheryl Coakley-Rivera (the “Affidavit”).

3. Rep. Coakley-Rivera was given a copy of her final Affidavit, which she signed on February 1, 2007. She returned the signed, original Affidavit to me via Federal Express.

4. On the afternoon of February 2, 2007, sometime before 5:00, Representative Coakley-Rivera called me to ask when her affidavit would be filed. I told her that the filing deadline for the federal court was 6:00 p.m., so the Affidavit would need to be filed by that time. I also told her that I would call her once the Affidavit had been filed.

5. I had no knowledge, nor did I have any reason to suspect, that Representative Coakley-Rivera's Affidavit or its contents might be disclosed or made available to the media before the Affidavit was officially filed. Representative Coakley-Rivera did not tell me that afternoon that she had disclosed, would disclose, or intended to disclose the Affidavit or its contents to the media. Nothing we said to each other that afternoon would have given me a basis to believe that the Affidavit would be disclosed before it was filed.

6. Because of the large number of Affidavits and attachments that Plaintiffs filed that day (28 Affidavits and attachments containing hundreds of pages), Representative Coakley-Rivera's affidavit did not actually go through the system until approximately 6:20 p.m.

7. Soon after the Affidavit had been filed, I attempted to contact Representative Coakley-Rivera by telephone to tell her that it had been filed. I reached her at approximately 7:20 p.m.

8. I did not disclose the Affidavit to the media, cause it to be disclosed, or suggest that it be disclosed before it was officially filed. I never contemplated that it would be disclosed to the media before it was officially filed, nor did I have any basis for believing that it would be disclosed to the media before it was officially filed.

Signed under penalties of perjury, this 7th day of February, 2007.

/s/ Anna-Marie L. Tabor
Anna-Marie L. Tabor